

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

All local and state governments that receive direct assistance from any of four major HUD programs—Community Development Block Grant (CDBG), HOME, Emergency Shelter Grant (ESG), or Housing Opportunities for Persons with AIDS (HOPWA)—are required to develop and implement a five year Consolidated Plan. This effort incorporates strategic planning and citizen involvement to develop more effective programs and prioritize the use of HUD funds. A grantee must also submit an annual action plan and grant application that describes the activities that will be undertaken in a particular year to implement the overall Plan. The Annual Action Plan also provides a basis for assessing performance.

The City of Bismarck receives direct funding from HUD in only one of the covered programs--CDBG. Accordingly, its annual action plan contains only a CDBG application and required data that is relevant to the Consolidated Plan. The 2016 Annual Action plan is the second year in the City's five year Consolidated Plan. It must be noted that CDBG funds may be used only for activities that primarily benefit low and moderate-income (LMI) persons, eliminate conditions of slum and blight, or address an urgent community need. The three main objectives of CDBG program are to provide decent housing, create sustainable living environments, and develop economic opportunity.

#### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The following are the goals that were developed and approved for the Consolidated Plan:

##### **1. Housing:**

- Assist with the development or renovation of affordable rental housing
- Promote the development or renovation of special needs housing
- Support homeownership opportunities for low to moderate income (LMI) families

##### **1. Homelessness:**

- Support the renovation or expansion of facilities

- Assist in the development of additional housing
- Provide for service providers that promote self-sufficiency
- Allocate funds to prevent homelessness

1. Community Development:

- Support public service activities that provide essential services to persons who are LMI, homeless, or may have special needs
- Improve the quality of public facilities that are located in LMI neighborhoods or that primarily serve LMI persons

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

2016 is the second year of the 2015-19 Consolidated Plan. Although progress was made in the first year, many goals have yet to be realized. Homelessness issues and housing affordability continue to be the primary concerns. As a result, nearly 80% of the public service funding was allocated to projects addressing homelessness. Additional funding was awarded to renovate a shelter for victims of domestic violence. Affordable housing continues to be a concern. Two activities addressed this concern: renovation/preservation of Section 8 rental housing and housing accessibility. Special needs housing is also a concern, and two such projects received CDBG funding for renovation. Two projects will benefit seniors (public service and facility renovation).

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Citizen participation included notices of public hearings, advertisements, and outreach/consultation with local organizations to obtain comments, suggestions for funding, and agency proposals.

### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Many comments indicated that there were issues in housing: affordability, accessibility, and outreach/education to work with households facing eviction or homelessness. Other concerns included the need for more services and housing for households who were homeless, such as emergency housing, homelessness prevention, support services wet house, and a soup kitchen to replace one that recently closed. Some suggestions included an advocacy program for persons with developmental

disabilities, renovation of parks to make them easier to use by seniors. Another suggestion was to use all of the CDBG funding for several years to fund the Five South Project as a slum and blight project so that taxes remain low.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

Most suggestions were for needed activities, but CDBG funding was insufficient to implement all suggestions. Two suggestions recommended activities to be implemented by specific organizations (e.g., ARC and Park District). However, these organizations had submitted applications for different activities. Copies of the suggestions were sent to the organizations (one had written a different grant application to fund the activity). Housing accessibility, emergency housing, and homeless prevention activities were funded. A soup kitchen was not funded since no organization/location had been identified to do the project. Communication with the person who made the Five South suggestion provided further clarification on the ineligibility of the suggestion (e.g., 100% of CDBG funds for slum & blight).

## **7. Summary**

Consultations with other agencies and public input all helped formulate the 2016 Annual Action Plan. A total of 11 projects were recommended for CDBG funding. Most of the public service funding was awarded to agencies that provide services to prevent homelessness, while public facility improvements focused on renovation of an emergency shelter, Senior Center, and 2 facilities providing housing and supportive services. Housing activities included funding for accessibility and renovation of Section 8 rental housing.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BISMARCK	Community Development Department

Table 1 – Responsible Agencies

### Narrative (optional)

#### Consolidated Plan Public Contact Information

Community Development Department

City of Bismarck

221 N. 4th Street--PO Box 5503, Bismarck, ND 58506-5503

Phone: 701-355-1840; Fax: 701-222-6450; TDD 711

sredman@bismarcknd.gov

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The lead agency responsible for administering the CDBG program covered by the 2015-19 Consolidated Plan is the City of Bismarck's Community Development Department.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

Community Development Department staff maintained dialogue with the local social service, community development, and housing agencies throughout the year. This effort was enhanced by participation in local meetings of the Homeless Coalition, homeless awareness week, training events, housing conferences, public hearings, and other meetings. In addition, staff initiated and maintained contact with state agencies that funded local entities.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Continuum of Care is a statewide effort. The local coalition and its members (includes the City) do participate annually in the statewide effort to develop a COC Plan. Funding priorities and recommendations are developed at the State level. Several local agencies have received funding through this process. The City provides information and technical assistance as needed and consults with the local Homeless Coalition in helping to determine local needs.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The State of North Dakota determines ESG allocations, performance standards, and evaluation of activities. It also provides administrative procedures for HMIS. Upon request, the City provides certification of ESG applicants for their ESG applications.

### **2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	BURLEIGH COUNTY HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City works with the housing authority on an ongoing basis, particularly in the development or renovation of rental projects under the Housing Authority's jurisdiction. This collaboration includes working on joint applications to the state for HOME program funding
2	<b>Agency/Group/Organization</b>	AFFORDABLE HOUSING DEVELOPERS INC.
	<b>Agency/Group/Organization Type</b>	Housing CHDO
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings were held to discuss possible HOME rental projects in Bismarck and to discuss the impact of program changes.

3	<b>Agency/Group/Organization</b>	Lewis & Clark Regional Devel. Council
	<b>Agency/Group/Organization Type</b>	Housing Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults and partners with this organization on an emergency rehab program for Bismarck.
4	<b>Agency/Group/Organization</b>	Missouri Valley Coalition for Homeless Persons
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City works with this local/regional organization to identify local needs and set priorities for funding. The City also is helping with an update to the 10 year plan, etc.
5	<b>Agency/Group/Organization</b>	ND Coalition for Homeless Persons
	<b>Agency/Group/Organization Type</b>	Services-homeless statewide coalition/COC

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization is the lead organization for the Continuum of Care process and is also funding a staff persons for the local coalition. Recent staff changes will means that consultation should be increased in the future.
6	<b>Agency/Group/Organization</b>	Abused Adult Resource Center
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City works with this agency on an ongoing basis (sub-recipient of CDBG)to develop facilities and services for victims. of domestic violence.
7	<b>Agency/Group/Organization</b>	WELCOME HOUSE
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Welcome House is a subrecipient of CDBG funds and is consulted on issues concerning the needs of homeless families.
8	<b>Agency/Group/Organization</b>	SALVATION ARMY - BISMARCK
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency is contacted on issues concerning homeless prevention and changing local needs. They use CDBG funds to address this issue.
9	<b>Agency/Group/Organization</b>	West Central Human Service Center
	<b>Agency/Group/Organization Type</b>	Services-homeless Other government - State Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	West Central provides information on the needs of chronically homeless persons with mental illness concerns. Information is used to develop priorities and projects.
10	<b>Agency/Group/Organization</b>	Aid, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Aid, Inc. is consulted to obtain information on community trends housing and anti-poverty strategies. This organization provides valuable information on local need.

11	<b>Agency/Group/Organization</b>	YOUTHWORKS
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency is consulted to obtain local information the need for services and facilities for on at-risk youth and runaways. Moreover, they have provided leadership on local homeless issues for the local coalition.
12	<b>Agency/Group/Organization</b>	ND Division of Community Services
	<b>Agency/Group/Organization Type</b>	Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with this state agency in order to gain info on statewide need and possible funding for local projects.
13	<b>Agency/Group/Organization</b>	Pride, Inc.
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with this information to obtain information about the need for special needs housing since Pride provides housing & support services to people with disabilities.
14	<b>Agency/Group/Organization</b>	DACOTAH FOUNDATION
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with this agency to gain more knowledge about the needs of persons with serious mental illness. The City has an ongoing program to fund improvements to Dacotah Foundation facilities that provide housing & support services.
15	<b>Agency/Group/Organization</b>	High Plains Fair Housing Center
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with this agency to help it determine what the greatest Fair Housing concerns are in Bismarck. The City is working with this agency on outreach and education.
16	<b>Agency/Group/Organization</b>	Legal Services of North Dakota
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation with this agency has provided the City with information on local housing issues (legal) for LMI persons and is working with this agency to increase outreach to prevent homelessness.
17	<b>Agency/Group/Organization</b>	COMMUNITY ACTION PROG. REG VII
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with HIV/AIDS Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation with this agency provides vital information on housing needs of LMI households. This has resulted in CDBG funding for housing accessibility and several HOME applications for TBRA. Increased communication is needed due to recent staff turnover and changes in the state HOME program. This agency does an housing accessibility program which provides data on needs of persons with disabilities.
18	<b>Agency/Group/Organization</b>	Burleigh County Council on Aging
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with this agency to obtain information on the housing and service needs of elderly households. This dialogue has resulted in CDBG funding of facility improvements over the last few years.
19	<b>Agency/Group/Organization</b>	Bismarck Veterans Memorial Library
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Education Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization provided useful information on the needs of homeless persons that use its facility. As a result, a job club was organized and provides useful job search info.
20	<b>Agency/Group/Organization</b>	Missouri Slope United Way
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Persons with Disabilities Services-homeless Services-Health Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation with this agency is ongoing. They provide information on local needs and the ability of local nonprofits to provide services. Their staff helps review CDBG applications and helps make recommendations for funding.

### Identify any Agency Types not consulted and provide rationale for not consulting

Economic development agencies were not consulted since no CDBG funding is awarded for this purpose. Instead, the city uses a local sales tax to fund these efforts.

### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	ND Coalition for the Homeless	Input from local agencies used in the state plan can also be converted for use in the City plan. Review of the state plan also helps the City set funding priorities for its CDBG program.

**Table 3 – Other local / regional / federal planning efforts**

### Narrative (optional)

Other City departments were consulted. For instance, the Health Department provided information on health needs of LMI households. The Inspections Division provided input on housing quality, need and demand. The Public Works and Engineering Departments provide information on local infrastructure needs. The ND State Health Department is consulted when needed to obtain technical assistance on lead based paint and asbestos issues.

## AP-12 Participation – 91.105, 91.200(c)

### 1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The process included a series of public hearings, advertisements, web info, and mailings. All notices gave the public a variety of ways to respond or to seek assistance. The process provided new information on community needs (e.g., soup kitchen due to closure of existing one) and confirmed a number of existing issues identified in the Consolidated Plan (affordable housing, homelessness). Unfortunately, need exceeded the available money, so funding allocations were based on pressing needs, goals in the Consolidated Plan, and the capability of applicants.

#### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Persons with disabilities  Non-targeted/broad community	one person responded with suggestions for CDBG funding	requested the City to use CDBG funds for outreach/education activities on housing issues (evictions) to be initiated by Legal Services of ND	Researched request; recommended unspent funds from prior years be allocated to Legal Services 2015 project rather than using 2016 funds	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-English Speaking - Specify other language: Spanaish  Persons with disabilities  Non-targeted/broad community	Newspaper ads/notices requested suggestions for CDBG application. A later notice asked comments on the CDBG application/AAP.	two suggestions received: one for ARC advocacy project for persons with developmental disabilities and the other was to make public parks more senior citizen friendly	Neither received funding since the agencies involved had requested CDBG funds for other activities. Comments were shared with the two agencies. No comments were received notice on the CDBG application/AAP.	
3	Public Hearing	Persons with disabilities  Non-targeted/broad community	no one attended and no one sent in written comments on the draft CDBG application/AAP	n/a	n/a	
4	Internet Outreach	Non-targeted/broad community	e-mail suggestion for CDBG funds	Suggested using all of the CDBG monies for the next few years to pay of the Five South bond issue. Five South is a multi-use project (housing, commercial, public facilities, parking).	Further consultation indicated that this was not an eligible use for CDBG funds due to lack of LMI eligibility or slum and blight. Citizen agreed after information was shared.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	agency consultation/mailings	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>agencies serving LMI clientele</p>	Several suggestions on local needs/CDBG needs were sent to the City	<p>Most were for activities already receiving CDBG funding, such as housing rehab, housing accessibility &amp; affordable housing. There were a number of other ideas on homelessness.</p>	There was insufficient CDBG funds for all of the suggestions including: another family shelter, supportive housing, wet house, and new soup kitchen.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

The City of Bismarck will receive \$293,426 in CDBG funding for 2016. No Program income is expected. In addition \$9000 unobligated funds from prior years was also allocated to new projects.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	293,426	0	9,000	302,426	850,000	CDBG funding

**Table 5 - Expected Resources – Priority Table**

#### **Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The housing and community development needs in Bismarck greatly exceed the available funding from the CDBG program. Most activities funded with CDBG funds will also require funding from a variety of funding sources, including: state and federal governments; foundations; private donations of money or in-kind services, and other funding sources. The City does not receive HOME funding directly from HUD, but

previously HOME projects funded through the State continue to generate HOME match of nearly \$1 million annually.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

not applicable

**Discussion**

administration = \$57,426

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Assist with development or renovation of rental	2015	2019	Affordable Housing	Citywide	Rental Housing	CDBG: \$65,000	Rental units rehabilitated: 24 Household Housing Unit
2	Support renovation of facilities serving homeless	2015	2019	Homeless	Citywide	Homeless housing and services	CDBG: \$16,000	Homeless Person Overnight Shelter: 225 Persons Assisted
3	Support public service activities	2015	2019	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Improve access to public services	CDBG: \$2,500	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
4	Improve the quality of public facilities	2015	2019	Non-Housing Community Development	Citywide	Improve public facilities	CDBG: \$77,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2075 Persons Assisted
5	Promote special needs housing	2015	2019	Affordable Housing Non-Homeless Special Needs	Citywide	Special Needs Housing	CDBG: \$55,000	Homeowner Housing Rehabilitated: 12 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Allocate funds to prevent homelessness	2015	2019	Homeless	Citywide	Homeless housing and services	CDBG: \$24,000	Homelessness Prevention: 60 Persons Assisted
7	Provide for homeless service providers	2015	2019	Homeless	Citywide	Homeless housing and services	CDBG: \$5,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

**Table 6 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	Assist with development or renovation of rental
	<b>Goal Description</b>	CDBG funds will be used to renovated 24 units of Section 8 Housing that is owned by Community Homes of Bismarck and managed by Burleigh County Housing Authority.
2	<b>Goal Name</b>	Support renovation of facilities serving homeless
	<b>Goal Description</b>	CDBG funds will be used to renovate Pam's House, a shelter for victims of domestic violence, that is operated by Abused Adult Resource Center.
3	<b>Goal Name</b>	Support public service activities
	<b>Goal Description</b>	CDBG funds will be used to purchase portable dental equipment that will be used for a dental outreach program that provides services to residents of nursing homes or other institutions.

4	<b>Goal Name</b>	Improve the quality of public facilities
	<b>Goal Description</b>	renovation of three facilities: Senior Center (2000) CHYS: provides housing and services to at-risk youth (25 youth) Dacotah Foundation: housing and supportive services to adults with serious mental illness (50 persons)
5	<b>Goal Name</b>	Promote special needs housing
	<b>Goal Description</b>	project uses CDBG funds to improve accessibility in housing
6	<b>Goal Name</b>	Allocate funds to prevent homelessness
	<b>Goal Description</b>	CDBG funding will be used by 3 agencies to provide emergency housing assistance to homeless or potentially homeless persons: AID, Inc. (20 persons): prevent homelessness Salvation Army (24 persons): prevent homelessness West Central Human Service Center (16 persons): prevent homelessness/focus on persons with mental illness
7	<b>Goal Name</b>	Provide for homeless service providers
	<b>Goal Description</b>	Welcome House: case management and emergency housing (motels)

**Table 7 – Goal Descriptions**

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

Washington Court: 24 extremely low-income households

Housing Accessibility: 10 extremely low income households and two low income households

## AP-35 Projects – 91.220(d)

### Introduction

The Annual Action Plan for 2016-17 is the second year for the Five Year Consolidated Plan. This Plan outlines the steps the City will use to address housing and community development needs. The City has allocated \$57,426 for administrative costs. The following is a listing of activities that the City will undertake during the next year to utilize CDBG funds:

#	Project Name
1	AARC shelter renovation
2	Aid, Inc. Emergency Housing Assistance
3	Bridging the Dental Gap
4	Burleigh County Council on Aging
5	Charles Hall Youth Services -renovation of Hall Home
6	CAP - Housing Accessibility
7	Renovation of Washington Court
8	Dacotah Foundation - Arbor Group Home renovation
9	Salvation Army - emergency housing assistance
10	Welcome House - emergency housing assistance
11	West Central Human Service Center - emergency housing asst.
12	Administration

**Table 8 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocations were based on local need, priorities in the Consolidated Plan, and past performance of applicants.

If any additional CDBG funding becomes available during the program year, it may be awarded to agencies that did not receive full funding or have construction projects that exceeded the estimated budget. Funds could also be awarded to unfunded projects that benefit at-risk youth.

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 9 – Project Summary

1	<b>Project Name</b>	AARC shelter renovation
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Support renovation of facilities serving homeless
	<b>Needs Addressed</b>	Improve public facilities Homeless housing and services
	<b>Funding</b>	CDBG: \$16,000
	<b>Description</b>	CDBG funds will be used to renovate the kitchen and other areas in Pams House--an emergency shelter for victims of domestic violence.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 13 families a day will use the kitchen facilities while staying at the shelter (225 persons annually). The shelter is designated for persons/families that are victims of domestic violence.
	<b>Location Description</b>	This is a shelter for victims of domestic violence, so an exact location must be kept confidential
	<b>Planned Activities</b>	Renovation of shelter to include kitchen renovation.
2	<b>Project Name</b>	Aid, Inc. Emergency Housing Assistance
	<b>Target Area</b>	Citywide

	<b>Goals Supported</b>	Allocate funds to prevent homelessness
	<b>Needs Addressed</b>	Homeless housing and services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	CDBG funds will be used to provide emergency housing assistance to low and moderate income (LMI) households. Assistance will help prevent homelessness.
	<b>Target Date</b>	5/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 20 to 25 low income families will be assisted.
	<b>Location Description</b>	community-wide
	<b>Planned Activities</b>	CDBG funds will be used for emergency housing assistance to prevent homelessness. Assistance may be in the form of payment of back rent or utilities and security deposits.
<b>3</b>	<b>Project Name</b>	Bridging the Dental Gap
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Support public service activities
	<b>Needs Addressed</b>	Improve access to public services
	<b>Funding</b>	CDBG: \$2,500
	<b>Description</b>	CDBG funds will be used to purchase portable dental equipment for Bridging the Dental Gap. Bridging the Dental Gap is a nonprofit that provides dental services to low income persons. The portable dental equipment (suction) will be used to provide dental care to low income seniors or persons with disabilities that reside in local nursing homes or similar institutions.
	<b>Target Date</b>	5/31/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Assistance will be provided to low income persons who are frail elderly and/or disabled and are residents for nursing homes or other institutions. Approximately 250 persons could be assisted.
	<b>Location Description</b>	community wide
	<b>Planned Activities</b>	CDBG funds will be used to purchase a portable suction machine that may be easily transported to several locations in the community.
<b>4</b>	<b>Project Name</b>	Burleigh County Council on Aging
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve the quality of public facilities
	<b>Needs Addressed</b>	Improve public facilities
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	CDBG funds will be used for renovation of the Senior Center and will include such work as replacement of windows.
	<b>Target Date</b>	5/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 2000 seniors are served annually.
	<b>Location Description</b>	315 N. 20th Street, Bismarck, nd
	<b>Planned Activities</b>	CDBG funds will be used to renovate the Senior Center. Work will include replacement of sindows in order to improve energy efficiency.
<b>5</b>	<b>Project Name</b>	Charles Hall Youth Services -renovation of Hall Home
	<b>Target Area</b>	Citywide

	<b>Goals Supported</b>	Improve the quality of public facilities
	<b>Needs Addressed</b>	Improve public facilities Special Needs Housing
	<b>Funding</b>	CDBG: \$23,500
	<b>Description</b>	Renovation of a facility that provides housing & services to at-risk youth
	<b>Target Date</b>	5/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 25 at-risk foster care youth will reside at this location.
	<b>Location Description</b>	320 S. 14th Street, Bismarck, ND
	<b>Planned Activities</b>	Renovation will include such work as roof replacement and new flooring.
6	<b>Project Name</b>	CAP - Housing Accessibility
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Promote special needs housing
	<b>Needs Addressed</b>	Owner-Occupied Housing Special Needs Housing
	<b>Funding</b>	CDBG: \$55,000
	<b>Description</b>	CDBG funding will be used to make accessibility improvements in housing in which one of the households members has a disability.
	<b>Target Date</b>	9/30/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Community Action Program would use CDBG funds to make accessibility improvements in housing in which a households member has a disability. Approximately 12 LMI households will be assisted.
	<b>Location Description</b>	community wide
	<b>Planned Activities</b>	Renovation of housing will include such work as ramps, bathroom improvements, door widening, lifts, etc.
<b>7</b>	<b>Project Name</b>	Renovation of Washington Court
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Assist with development or renovation of rental
	<b>Needs Addressed</b>	Rental Housing
	<b>Funding</b>	CDBG: \$65,000
	<b>Description</b>	CDBG funding would be used to renovate a portion of Washington Court, a Section 8 project.
	<b>Target Date</b>	8/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 24 units will be renovated. Tenants must be low income since this is a Section 8 housing project. Beneficiaries would include individuals and families.
	<b>Location Description</b>	Washington Court Apartments (exact building has not yet been determines).
	<b>Planned Activities</b>	Washington Court is an older Seaction 8 apartment complex. CDBG funds and other funding will be used to renovate one of four buildings. WOrk will include interior/exterior modernization. The project is owned by a nonprofit (Community Homes of Bismarck) and managed by the Burleigh County Housing Authority.
<b>8</b>	<b>Project Name</b>	Dacotah Foundation - Arbor Group Home renovation
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve the quality of public facilities

	<b>Needs Addressed</b>	Improve public facilities
	<b>Funding</b>	CDBG: \$24,000
	<b>Description</b>	CDBG funds will be used for renovation of a bathroom and other needed repairs.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 50 persons will benefit annually. Residents are primarily low income and have a mental illness.
	<b>Location Description</b>	510 W. Arbor Avenue, Bismarck, ND
	<b>Planned Activities</b>	Dacotah Foundation is a nonprofit that provides housing and support services to persons with serious mental illness. Renovation will include updating a bathroom that also needs accessibility improvements.
9	<b>Project Name</b>	Salvation Army - emergency housing assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Allocate funds to prevent homelessness
	<b>Needs Addressed</b>	Homeless housing and services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	CDBG funds will be used to provide emergency housing assistance to LMI households in order to prevent homelessness.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 24 LMI households will be assisted.
	<b>Location Description</b>	communitiy wide

	<b>Planned Activities</b>	CDBG funding will be used to provide emergency housing assistance to LMI households in order to prevent homelessness. Assistance can include payment of back rent or security deposits.
<b>10</b>	<b>Project Name</b>	Welcome House - emergency housing assistance
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Provide for homeless service providers
	<b>Needs Addressed</b>	Homeless housing and services
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	CDBG funding will be used to provide emergency shelter (motels) and case management to families who are homeless.
	<b>Target Date</b>	8/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A estimated 50 persons will benefit. All will be low income and homeless.
	<b>Location Description</b>	community wide
	<b>Planned Activities</b>	CDBG assistance will be used to provide emergency shelter (motels) and case management for homeless families.
<b>11</b>	<b>Project Name</b>	West Central Human Service Center - emergency housing asst.
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Allocate funds to prevent homelessness
	<b>Needs Addressed</b>	Homeless housing and services
	<b>Funding</b>	CDBG: \$4,000

	<b>Description</b>	CDBG funds will be used to provide emergency housing assistance to persons diagnosed with a serious mental illness.
	<b>Target Date</b>	8/31/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximate 16 households with a serious mental illness will be assisted.
	<b>Location Description</b>	community-wide
	<b>Planned Activities</b>	CDBG funds will be used for emergency housing assistance to persons diagnosed with a serious mental illness and who are homeless or at risk of homelessness. Qualified persons will be assisted with rent or a security deposit. Supportive services will be provided by West Central.
<b>12</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Assist with development or renovation of rental Promote special needs housing Support renovation of facilities serving homeless Provide for homeless service providers Allocate funds to prevent homelessness Support public service activities Improve the quality of public facilities

<b>Needs Addressed</b>	Rental Housing Owner-Occupied Housing Improve public facilities Improve access to public services Homeless housing and services Special Needs Housing Public infrastructure
<b>Funding</b>	CDBG: \$57,426
<b>Description</b>	Program administration
<b>Target Date</b>	5/31/2017
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	administration/not applicable
<b>Location Description</b>	not applicable
<b>Planned Activities</b>	administration

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The City has not established specific target areas to focus the investment of CDBG funds. However, many facility improvements will occur in areas with concentrations of low and moderate income (LMI) population.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	

**Table 10 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

not applicable

### **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Bismarck will use CDBG funds to rehab existing units (24 rental; 12 homeowner/accessibility-special needs). CDBG funds will also be used to prevent homelessness via payment of back rent, back utilities, or security deposits. Approximately 50 people will be assisted.

One Year Goals for the Number of Households to be Supported	
Homeless	50
Non-Homeless	24
Special-Needs	12
Total	86

**Table 11 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	50
The Production of New Units	0
Rehab of Existing Units	36
Acquisition of Existing Units	0
Total	86

**Table 12 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Burleigh County Housing Authority manages the Public Housing units located in the City of Bismarck.

### **Actions planned during the next year to address the needs to public housing**

No CDBG funding has been allocated for Public Housing Improvements. However, CDBG funding has been allocated to for the renovation of a Section 8 housing project managed by the Burleigh County Housing Authority

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The Housing Authority will continue to offer its homeownership program. This program provides an opportunity for one to three interested tenants residing in public housing to purchase the single family dwelling which they rent. Tenant meetings are also held on a regular basis.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

PHA has not been designated as troubled.

### **Discussion**

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Activities that will benefit homeless persons and prevent homelessness were identified as a priority need in the Consolidated Plan. CDBG funding will be used for the renovation of homeless facilities for public services that provide emergency assistance and homeless prevention.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Bismarck participates in a statewide Continuum of Care and several local agencies receive funding through that process. It also serves as a clearinghouse for statewide information on homeless data and resources, identifies gaps in services, and provides leadership in strategic planning. The local coalition provides education/outreach, services, and a means for local agencies to communicate and cooperate. It also coordinates the annual point-in-time surveys. The City will continue to work with the local coalition and is providing CDBG assistance for homelessness prevention to at risk-households and emergency services for homeless households. Local service agencies have received training in the past year on a coordinated assessment process in order to identify homeless households with the greatest needs. The City will also be working with local service agencies to develop a new soup kitchen.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Emergency assistance funded through CDBG will limit the number of households entering homelessness. In addition, the City is using CDBG funds to renovate an emergency shelter for victims of domestic violence (AARC). The City will also participate in an effort to update the 10 year plan to end homelessness.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were**

## recently homeless from becoming homeless again

Four projects will help households avoid homelessness by offering emergency housing assistance. CDBG funding to West Central Human Service Center will focus on persons diagnosed with serious mental illness. The agencies will also provide case management, counseling, and referrals to other services.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Two of the funded agencies (Salvation Army and Aid) will focus on prevention of homelessness by using CDBG funds for security deposits or for back rent and utility payments. Both agencies provide other services to the households.

## Discussion

The City will apply for HOME funds from the State of North Dakota for Tenant Based Rental Assistance (TBRA). If granted, funds will be used for both rental assistance and security deposits. The Community Action Program will manage the program and provide supportive services to tenants.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

The most highly rated barriers to affordable housing identified in the Consolidated Plan were the cost of land/lot, cost of labor, and cost of materials.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Most of the barriers to affordable housing that were cited in the Consolidated Plan were outside the control of the City such as cost of land and labor. However, the City will continue to encourage non-profit and private developers to apply for CDBG and HOME funding (via the state). It will also provide support to these entities apply to the State for HIF funding or have Low Income Housing Tax Credits. The Mayor has instructed the Planning Division to begin efforts for a “Footprint Initiative” in order to encourage more sustainable, affordable, and cost-effective housing development.. As a result, the following zoning changes will be researched and possibly developed in the upcoming year:

- Smaller lot sizes
- Accessory dwelling units
- Infill & redevelopment plans, including floating zones
- Methods to encourage decreased costs for infrastructure and land
- Reduced street width standards for new neighborhoods (recently passed)
- On-going consultation with local housing developers on ways to provide more affordable options

### **Discussion**

The Community Development Department includes the Inspections Division, so it is better able to provide information on zoning, land use, parking, permits, and other information needed for development. The Department reviews proposals and discusses all new developments with developers before meetings with the Planning Commission. Most City fees are reasonable, and the City charges no impact fees. The City also uses a single permit application process for housing development and provides for fast track permitting and approval of housing and other developments. Parking requirements can be waived for elderly housing or other special need housing. A Quiet Rail zone is being implemented in the downtown area. It is expected that will facilitate development of housing (e.g., two LIHTC projects were recently approved).



## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

The following narrative describes additional actions that the City of Bismarck will undertake during the 2016 grant year.

### **Actions planned to address obstacles to meeting underserved needs**

The City has found that the largest obstacle to meeting underserved needs is the lack of resources. While the City has no control over the amount of resources it will receive, the City will allocate what funds it does have to try to meet the priority needs identified in the Consolidated Plan. The City has also allocated a large share of its CDBG public service funds to emergency housing assistance needs since this has been one of the greatest priority needs due a shortage of affordable housing and facilities to serve homeless or potentially homeless persons

### **Actions planned to foster and maintain affordable housing**

During the 2016 program year, the City will continue to use CDBG funding for LMI households to improve accessibility and do emergency repairs. These activities will help maintain affordability for LMI households. In addition, CDBG funds will be used to renovate and preserve Section 8 rental housing that is owned by a local nonprofit and managed by the local housing authority. The Community Development Department through its Planning Division will also be researching ways to reduce costs in the development of new housing.

### **Actions planned to reduce lead-based paint hazards**

The City will continue to provide information on requirements and training to project owners and contractors working on CDBG funded activities. The State Health Department will provide technical assistance for these projects upon request.

### **Actions planned to reduce the number of poverty-level families**

The City of Bismarck will continue to support the Bismarck-Mandan Development association and local economic development projects with local sales tax revenue and other means, but will not use CDBG funds to fund economic development. The City will encourage reinvestment in the downtown through

its participation in the Renaissance Zone Program. The City will continue to work with both the Chamber of Commerce and the Downtown Business Association on revitalization and economic development. The Housing Authority will continue to operate its self-sufficiency program, and Community action will continue its self-reliance activities. Both programs help low income families escape poverty. Operational support, facility renovation, and improved accessibility will aid these efforts. The City will also use CDBG and HOME (if funded by the State) to support activities that encourage self-sufficiency, job training, supportive services, etc. These efforts will help the City to address poverty issues primarily through supportive services that encourage self-sufficiency.

### **Actions planned to develop institutional structure**

The City will implement no new actions to develop its institutional structure. The City will continue to work and communicate with the Burleigh County Housing Authority, adjacent units of government, local nonprofits, and social service agencies.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

No new actions are planned for FY 2016 to enhance coordination, but every effort will be made to encourage communication and awareness of programs and activities.

### **Discussion**

During the 2016 program year, the City of Bismarck will continue to direct funding to help meet the needs of LMI residents of the City. One hundred percent of CDBG activity funds will be allocated to activities benefitting LMI persons. These efforts, along with activities implemented by other public and private agencies, will help to address the priority needs identified in the Consolidated Plan.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### Discussion

Overall LMI benefit should be calculated on a 3 year basis: 2016, 2017 and 2018

